



WILLIAMS, PORTER, DAY & NEVILLE P.C.  
*Wyoming's Law Firm*

## Exhibit I

Amazon Defendants' Reply Brief in Support of  
Their Motion for Protective Order  
*DeBeer v. Amazon Logistics, Inc., et al.*

Stuart R. Day, W.S.B. # 5-2244  
Keith J. Dodson, W.S.B. # 6-4254  
WILLIAMS, PORTER, DAY & NEVILLE, P.C.  
159 North Wolcott, Suite 400 (82601)  
P. O. Box 10700  
Casper, Wyoming 82602  
Telephone: (307) 265-0700  
Facsimile: (307) 266-2306  
Emails: sday@wpdn.net  
kdodson@wpdn.net

*Attorneys for Amazon Defendants*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

KIMBERLY DEBEER, surviving spouse and )  
wrongful death personal representative of )  
DANIEL DEBEER, deceased, )  
)  
Plaintiffs, )

v. )

Civil No. 23-CV-33-ABJ

)  
AMAZON LOGISTICS, INC. d/b/a )  
PRIME, AMAZON.COM, INC., )  
AMAZON.COM SERVICES LLC, )  
AAF555 LLC, NORTHWEST EXPRESS, LLC, )  
ASD EXPRESS, LLC, and JUSTIN NZARAMBA )  
)  
Defendants. )

---

**DECLARATION OF BRIAN COPPINGER**

---

I HEREBY DECLARE under the penalties of perjury that the following is true and correct:

1. My name is Brian Coppinger.
2. I started with Amazon on February 7, 2022. I am a Senior Program Manager working with Amazon's North American Surface Transportation Safety and Compliance Team. In my capacity as Senior Program Manager, I address monitoring and detection of data relating to aspects of motor carrier compliance with the Amazon Relay Carrier Terms of Service and Program Policies.

3. I was recently informed that the plaintiffs in the above referenced matter seek to take my deposition in this case which I have been told involves a motor vehicle accident that took place on March 31, 2021 on Interstate 80 in Sweetwater County, Wyoming at about 3:05 PM when a semi-tractor trailer being operated by Justin Nzaramba (“Nzaramba”), a driver for motor carrier Northwest Express, LLC (“Northwest”).
4. I have no direct or intimate personal knowledge about the accident which is the basis of this claim, Defendant Nzaramba, Defendant Northwest or the other named Defendants. I did not work with, speak to, monitor, supervise, or provide any sort of safety supports for Defendant Nzaramba, Defendant Northwest or the other named Defendants.
5. I did not personally investigate this accident. To be clear, I had no specific involvement with this accident, its reporting, the persons involved in the accident, and the selection or retention of Northwest or the other named Defendants.
6. More specifically:
  - a. I was not a witness to this accident.
  - b. To the best of my recollection, I have never met, spoken to, or otherwise communicated with Nzaramba or any of the principals of Northwest or the other named Defendants. As a Senior Program Manager working with Amazon’s North American Surface Transportation Safety and Compliance Team, I generally do not have discussion with the transportation carriers or their drivers.
  - c. I do not know, and have never met, the plaintiffs.
  - d. I do not recall any direct communication with any Amazon personnel stationed at the Franklin Township, New Jersey facility where the subject crash load was picked up.
  - e. I did not personally retain nor otherwise request the services of Northwest or the other named Defendants, or the driver involved in the accident, nor do I otherwise have any personal knowledge about their retention.
7. In my role with Amazon, I am not designated to provide testimony on behalf of Amazon relative to the policies, procedures, practices, or documents that govern the work done by the Amazon Logistics, Inc. and/or in the Amazon Relay program.
8. If there are any specific questions related to the subject crash load, management of motor carrier compliance with the requirements set forth in Amazon’s Relay Terms of Services, or any other general safety policy or procedure questions relative to Amazon, it is my

understanding that Amazon has identified an appropriate corporate witness designee to offer testimony on its behalf.

DocuSigned by:  
*Brian Copping*  
14D24B140310476...

4/8/2024

Brian Copping  
Senior Program Manager  
Amazon

Date